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Proposed Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE:

MID WEST HOTEL LODGING, LLC,

Debtor.

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CASE NO: 11-40629

CHAPTER 11

**DEBTOR'S APPLICATION TO**  
**EMPLOY ACCOUNTANT**

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH RESPONSE. IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF A RESPONSE IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

TO THE HONORABLE JUDGE OF THE UNITED STATES BANKRUPTCY COURT:

COMES NOW, Mid West Hotel Lodging, LLC ("Debtor"), the Debtor in the above-styled and numbered case and files this its Application to Employ Accountant and in support of same would respectfully show the Court as follows:

1. Debtor filed its voluntary petition under Chapter 11, title 11, of the United States Bankruptcy Code on or about February 28, 2011 in the United States Bankruptcy Court for the Eastern District of Texas, Sherman Division.

2. In order to prepare the Debtor's monthly operating reports, the Debtor desires to now hire, Samir Patel ("Patel") as accountant on behalf of the Debtor in this matter.

3. Pursuant to Bankruptcy Rule 2014(a), the Affidavit of Patel is attached hereto as Exhibit "A" and attests that he holds no interest against the Debtor for pre-petition services, is disinterested within the meaning of 11 U.S.C. §101(13) to the best of his knowledge, information, and belief as to the estate and its creditors.

4. Patel has been paid no retainer in these proceedings.

5. Patel has agreed to prepare the monthly operating reports for a monthly charge of \$500.00.

6. The shareholders of the Debtor have agreed to pay all Patel's fees and expenses for services rendered during the pendency of the bankruptcy.

7. Debtor believes the employment of Patel, as accountant, is in the best interest of the Debtor's bankruptcy estate.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays this Honorable Court enter an Order approving the employment of Samir Patel as accountant for Debtor, on the terms and conditions contained herein as of February 28, 2011 and for such other and further relief, at law or in equity, to which Debtor may show itself justly entitled.

Respectfully submitted,

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BY: /s/ Arthur Ungerman  
Arthur Ungerman  
SBN 20391000  
ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the forgoing document was forwarded to the attached mailing matrix by electronic filing to those persons receiving electronic notice or First Class US Mail on March 8, 2011.

/s/ Arthur Ungerman  
Arthur Ungerman